

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

SAAD JALAL,

Defendant.

Case No. 1:20-CR-261

CONSENT MOTION FOR ENTRY OF A STIPULATED PROTECTIVE ORDER

The United States of America, by and through undersign counsel, respectfully moves this Honorable Court for entry of the attached stipulated Protective Order, pursuant to Federal Rule of Criminal Procedure 16(d)(1) and Federal Rule of Evidence 502(d). Counsel for the defendant, Patrick Anderson, has reviewed the proposed protective order and advised that he does not oppose the filing of this motion. In support thereof, the United States submits the following:

1. During the course of the investigation, the United States has gathered or generated voluminous documents, including electronic records, which contain confidential information and personal identifiers for the defendant, unindicted co-conspirators, and non-parties in this case. These materials currently include and are anticipated to include, but are not limited to, law enforcement investigative reports pertaining to other individuals currently under investigation, as well as medical and/or toxicology reports. The United States intends to produce these documents and electronic records, in accordance with the Federal Rules of Criminal Procedure, relevant case law, and any Discovery Orders that are agreed upon and entered in this case.

2. Accordingly, the proposed Protective Order regulates discovery in this case by restricting the use and dissemination of documents and electronic records obtained through

discovery. In sum, the proposed Protective Order prohibits the dissemination of these documents and electronic records and the information contained therein to third parties, other than as necessary for the defendant's investigations of the allegations and preparation of their defenses.

3. The defendant has retained Patrick Anderson as counsel in this case. The defendant's counsel has reviewed this motion and the proposed protective order, and has agreed to its terms.

WHEREFORE, the undersigned respectfully requests that the Court enter the proposed protective order.

Respectfully Submitted,

Raj Parekh
Acting United States Attorney

By: _____/s/
Katherine E. Rumbaugh
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of April 2021, I electronically filed the foregoing using the CM/ECF system, which will automatically send a notification of such filing to all counsel of record.

/s/

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